

February 24, 2023

BY FEDERAL EXPRESS

Dulyn Group Inc.
c/o Daniel Naughton
1583 Irving Street
Baldwin, New York 11510

Dulyn Group Inc.
170-174 Stevens Avenue
Mount Vernon, New York 10550
Attn.: Daniel Naughton, or other Officer or Agent Authorized to Accept Service of Process

In re Dulyn Group Inc.
Chapter 7
Case No.: 23-22002-shl

Dear Mr. Naughton:

On behalf of Marianne T. O'Toole, the Chapter 7 Trustee ("Trustee") of the estate of Dulyn Group Inc. ("Debtor"), I write to address certain urgent and important matters so that the Trustee is able to fulfill her fiduciary duties in this case.

Pursuant to sections 323 and 704 of Title 11 of the United States Code, the Trustee is now the sole representative of the Debtor's estate. Among other things, the Trustee is entitled and obligated to take possession of and administer all property of the estate, and to investigate the Debtor's financial affairs. Accordingly, kindly make arrangements to have the documents and information requested below turned over to the Trustee as soon as possible but no later than **March 3, 2023.**

UNDER NO CIRCUMSTANCES IS THE DEBTOR OR ANYONE ACTING ON THE DEBTOR'S BEHALF PERMITTED TO ENCUMBER, TRANSFER OR OTHERWISE DISPOSE OF ASSETS OWNED DIRECTLY OR INDIRECTLY BY THE DEBTOR WITHOUT THE EXPRESS PERMISSION OF THE TRUSTEE. PLEASE BE ADVISED THAT THE PROHIBITION ON USING ASSETS IS EFFECTIVE IMMEDIATELY. THIS PROHIBITION INCLUDES, BUT IS NOT LIMITED TO, COLLECTING RENTS, USING CASH OR BANK ACCOUNTS OR ENTERING INTO OR RENEWING LEASES, IF ANY.

1. Bank Statements and Other Financial Records

- a. Please provide the Trustee with information regarding any and all cash or bank accounts in the Debtor's name or held for the benefit of the Debtor's including account numbers, bank names and locations, and login information and passwords for online access.
- b. Please provide copies of bank statements and cancelled checks for any and all bank accounts maintained by or on behalf of the Debtor for the period January 1, 2020 to the present. To the extent these documents are at the Debtor's premises or stored electronically, please let us know where specifically they are located.
- c. Please provide copies of any and all formational documents relating to the Debtor.
- d. Please provide copies of the Debtor's corporate state and federal income tax returns for the years 2019, 2020, 2021, and 2022.
- e. Please turn over, provide electronic access or make available to the Trustee all books and records pertaining to the Debtor's assets and financial affairs including, but not limited to, any "paper" books and records, computer and electronic files.

2. Real Property Records

- a. Please turn over copies of all agreements relating to the Debtor's real property located at 170-174 Stevens Avenue, Mount Vernon, New York 10550 ("Property") including, but not limited to, full copies of any and all leases relating to the Property.
- b. Please turn over copies of all documents reflecting the rental income and expenses for the Property, including depreciation schedules, from the date the Property was purchased by the Debtor to the present.
- c. Please provide contact information for any and all property managers, handymen or other persons providing services at the Property.
- d. Please turn over copies of all appraisals for the Property.
- e. Please turn over copies of any and all documents reflecting capital improvements made to the Property.

3. Liability/General Insurance

- a. All assets leased or owned directly or indirectly by the Debtor must be insured. Please provide proof of insurance for any and all assets leased or owned directly

or indirectly by the Debtor including, but not limited to, the Property and have the Trustee added as an additional insured on all such insurance policies.

- b. Please provide copies of any and all open insurance claims submitted by or on behalf of the Debtor pertaining to any and all of the Debtor's assets including, but not limited to, the Property.

4. Electronically Stored Information

- a. The Debtor is required to preserve any electronically stored information relating to the Debtor's assets and financial affairs ("ESI") and cannot destroy, conceal or alter any ESI including without limitation, all electronic mails that may be stored on third-party servers or internet services, from, to, or concerning the Debtor, the Debtor's assets and financial affairs, including hard drives, jump drives, CD-roms, backup tapes and disks.
- b. The Debtor should take affirmative steps to prevent anyone with access to the Debtor's ESI from seeking to modify, destroy or hide electronic evidence on network or local hard drives (such as by deleting or overwriting files, using data shredding and overwriting applications, defragmentation, re-imaging or replacing drives, encryption, compression, steganography or the like).

5. 401K/Retirement Plans

- a. Please provide copies of the plan documents for any employee benefit plans for which the Debtor is an administrator.
- b. Please provide website, login information and passwords for any employee benefit plans for which the Debtor is an administrator.

6. Furniture, Fixtures and Equipment

- a. Please provide the Trustee with an inventory of all furniture, fixtures, computers, and/or equipment owned or leased by the Debtor.
 - i. The inventory should specify which assets are owned and which are leased.
 - ii. The inventory should specify which owned assets are subject to financing.
- b. Please provide the Trustee with copies of all furniture, fixtures, computer, and/or other equipment, financing documents and the most recent account statement(s).

February 24, 2023

Page 4

7. Off-Site Storage

- a. Please provide a list of all off-site storage locations, including facility name(s), account number(s), location and contact information.


8. Accounts Receivable

- a. Please account to the Trustee for any and all accounts or loans receivable due and owing to the Debtor.

On behalf of the Trustee, we reserve the right to supplement these requests as deemed appropriate.

Thank you.

Sincerely,



Holly R. Holecek

cc: Christopher Patrick, Esq.
Marianne T. O'Toole, as Chapter 7 Trustee